

**MARVIN LLOYD ETHRIDGE** : 14<sup>TH</sup> JUDICIAL DISTRICT COURT

VS. NO. 2020 - 537 DIV \_\_\_\_ : PARISH OF CALCASIEU

**ROBERT JOHN METRA, FUELLGRAF  
CHIMNEY & TOWER, INC., AND  
HARLEYSVILLE INSURANCE  
COMPANY**

: STATE OF LOUISIANA

FILED: 2-6-2020

: *Kukym Jones*  
DEPUTY CLERK

**PETITION FOR DAMAGES**

The petition of **MARVIN LLOYD ETHRIDGE**, a person of the full age of majority, and  
a resident of the Parish of Calcasieu, State of Louisiana who with respect represent:

1.

Made Defendants herein are:

**ROBERT JOHN METRA**, a person of the age of majority and a resident of the State of  
Tennessee, who may be served through the Louisiana Long Arm Statute at his residence  
located at 1066 Forest Heights Road, Knoxville, TN 37919;

**FUELLGRAF CHIMNEY & TOWER, INC.**, a business located in the State of  
Pennsylvania, who may be served through the Louisiana Long Arm Statute at their place  
of business located at 1126 New Castle Road, Prospect, PA 16052; and

**HARLEYSVILLE INSURANCE COMPANY**, a foreign insurance company located in  
the State of Pennsylvania, who may be served through the Louisiana Secretary of State,  
8585 Archives Boulevard, Baton Rouge, LA 70809.

2.

On or about May 21, 2019, Petitioner, MARVIN LLOYD ETHRIDGE was operating his  
2012 Chevrolet Malibu and was southbound on Ryan Street in the left turning lane and was stopped  
for a red traffic light and as the light changed to green, suddenly and without warning he was rear-  
ended by defendant, ROBERT JOHN METRA, who was driving a 2018 Chevy Silverado.  
ROBERT JOHN METRA was in the course and scope of his employment with FUELLGRAF  
CHIMNEY AND TOWER, INC.

3.

In no way did Petitioner, MARVIN LLOYD ETHRIDGE contribute to causing this  
collision.



4.

The collision described above was caused solely and proximately by the recklessness, carelessness, negligence and fault of ROBERT JOHN METRA in violation of Louisiana traffic laws.

5.

At all times pertinent herein, the 2018 Chevy Silverado driven by ROBERT JOHN METRA, and owned by defendant, FUELLGRAF CHIMNEY & TOWER, INC., and was covered by a liability insurance policy which had been issued and delivered by HARLEYSVILLE INSURANCE COMPANY, which policy was in full force and affect and provided coverage for this crash.

6.

Defendants, ROBERT JOHN METRA, FUELLGRAF CHIMNEY & TOWER, INC., and HARLEYSVILLE INSURANCE COMPANY (NOW NATIONWIDE INSURANCE) are therefore liable in solido unto your Petitioner for the damages and losses sustained by Petitioner in said crash.

7.

As a result of this crash, Petitioner, MARVIN LLOYD ETHRIDGE was forced to undergo medical treatment, and has suffered restrictions and limitations upon his activities.

8.

As a result of the collision pled herein, plaintiff has suffered harms and losses, of which have historically been categorized as Special and General Damages under Louisiana law, said Special Damages to include medical bills.

9.

Petitioner herein, MARVIN LLOYD ETHRIDGE is therefore entitled to damages for the items set forth above in such amounts as are reasonable in the premises, which damages are not less than Fifty Thousand and No/100 (\$50,000.00) Dollars.

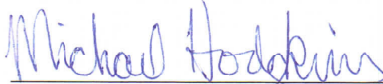
WHEREFORE, Petitioner, MARVIN LLOYD ETHRIDGE prays that:

I. Defendants be duly cited to appear and answer this petition and they be served with a copy of this petition;

II. After due proceedings had and the lapse of all legal delays, there be judgment herein in favor of Petitioner, MARVIN LLOYD ETHRIDGE, and against the Defendants, ROBERT JOHN METRA, FUELLGRAF CHIMNEY & TOWER, INC., and HARLEYSVILLE INSURANCE COMPANY, herein jointly, individually and in solido, for such damages as are reasonable in the premises, together with legal interest thereon from date of judicial demand until paid, and for all costs of these proceedings.

III. For all orders and decrees necessary in the premises; and for full, general and equitable relief.

Respectfully submitted,



**MICHAEL G. HODGKINS, BR#20862**

Veron, Bice, Palermo & Wilson, L.L.C.

721 Kirby Street (70601)

Lake Charles, LA 70602

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**SERVICE INSTRUCTIONS:**

**ROBERT JOHN METRA**

through the Louisiana Long Arm Statute  
1066 Forest Heights Road  
Knoxville, TN 37919

**FUELLGRAF CHIMNEY & TOWER, INC.**

through the Louisiana Long Arm Statute  
at their place of business  
126 New Castle Road  
Prospect, PA 16052

**HARLEYSVILLE INSURANCE COMPANY**

Through the Louisiana Secretary of State  
8585 Archives Boulevard  
Baton Rouge, LA 70809

**LOUISIANA CIVIL CASE REPORTING**  
**Civil Case Cover Sheet - LA. R.S. 13:4688 and**  
**Part G, §13, Louisiana Supreme Court General Administrative Rules**

This civil case cover sheet shall be completed by counsel for the petitioner, counsel's authorized representative, or by the self-represented litigant (if not represented by counsel) and submitted with the original petition filed with the court. The information should be the best available at the time of filing. This information does not constitute a discovery request, response or supplementation, and is not admissible at trial.

**Suit Caption:** MARVIN LLOYD ETHRIDGE : ROBERT JOHN METRA, FUELLGRAF  
CHIMNEY & TOWER, INC., AND  
HARLEYSVILLE INS. COMPANY

**Court:** 14<sup>th</sup> JUDICIAL DISTRICT COURT **Docket Number:** \_\_\_\_\_

**Parish of Filing:** Calcasieu **Filing Date:** \_\_\_\_\_

**Name of Lead Petitioner's Attorney:** MICHAEL G. HODGKINS,  
VERON, BICE, PALERMO & WILSON

**Name of Self-Represented Litigant:** \_\_\_\_\_

**Number of named petitioners:** 1 **Number of named defendants:** 3

**Type of Lawsuit: Please check the categories which most appropriately apply to this suit (no more than 3 categories should be checked):**

- |   |  |
|---|--|
| <input checked="" type="checkbox"/> Auto: Personal Injury | <input type="checkbox"/> Auto: Property Damage           |
| <input type="checkbox"/> Auto: Wrongful Death             | <input type="checkbox"/> Auto: Uninsured Motorist        |
| <input type="checkbox"/> Asbestos: Property Damage        | <input type="checkbox"/> Asbestos: Personal Injury/Death |
| <input type="checkbox"/> Product Liability                | <input type="checkbox"/> Premise Liability               |
| <input type="checkbox"/> Intentional Bodily Injury        | <input type="checkbox"/> Intentional Property Damage     |
| <input type="checkbox"/> Intentional Wrongful Death       | <input type="checkbox"/> Unfair Business Practice        |
| <input type="checkbox"/> Business Tort                    | <input type="checkbox"/> Fraud                           |
| <input type="checkbox"/> Defamation                       | <input type="checkbox"/> Professional Negligence         |
| <input type="checkbox"/> Environmental Tort               | <input type="checkbox"/> Medical Malpractice             |
| <input type="checkbox"/> Intellectual Property            | <input type="checkbox"/> Toxic Tort                      |
| <input type="checkbox"/> Legal Malpractice                | <input type="checkbox"/> Other Tort (describe below)     |
| <input type="checkbox"/> Other Professional Malpractice   | <input type="checkbox"/> Redhibition                     |
| <input type="checkbox"/> Maritime                         | <input type="checkbox"/> Class action (nature of case)   |
| <input type="checkbox"/> Wrongful Death                   | <input checked="" type="checkbox"/> Personal Injuries    |
| <input type="checkbox"/> General Negligence               |  |

**Please briefly describe the nature of the litigation in one sentence of additional detail:**

This is an automobile crash that occurred in Lake Charles, Louisiana on May 21, 2019 involving two automobiles wherein injuries were sustained.

Following the completion of this form by counsel, counsel's representative, or by the self-represented litigant, this document will be submitted to the Office of the Judicial Administrator, Supreme Court of Louisiana, by the Clerk of Court.

Name, address and contact information of person completing form:

Name MICHAEL G. HODGKINS Signature Michael Hodgkins

Address P.O. BOX 2125, LAKE CHARLES, LA 70602

Phone number 337-310-1600 E-mail address mgh@veronbice.com

FILED 2-6-2020  
Laikyn Long  
Deputy Clerk of Court  
Calcasieu Parish, Louisiana